| 1  | Kevin S. Sinclair, Esq., Nevada Bar No. 12277   |  |  |
|----|---|--|--|
| 2  | ksinclair@earlysullivan.com Sophia S. Lau, Esq., Nevada Bar No. 13365                             |  |  |
| 3  | slau@earlysullivan.com EARLY SULLIVAN WRIGHT  |  |  |
| 4  | GIZER & McRAE LLP<br>8716 Spanish Ridge Avenue, Suite 105   |  |  |
| 5  | Las Vegas, Nevada 89148 Telephone: (702) 331-7593   |  |  |
| 6  | Facsimile: (702) 331-1652   |  |  |
| 7  | Attorneys for Defendants TICOR TITLE OF NEVADA and CHICAGO TITLE INSURANCE COMPANY                |  |  |
| 8  | UNITED STATES DISTRICT COURT  |  |  |
| 9  | DISTRICT OF NEVADA  |  |  |
| 10 | CARRINGTON MORTGAGE SERVICES,   | Case No.: 2:20-cv-00699-JCM-NJK                        |  |
| 12 | LLC, Plaintiff,   | STIPULATION AND ORDER TO<br>EXTEND DEADLINE TO RESPOND |  |
| 13 | VS.   | TO MOTIONS TO REMAND AND FOR ATTORNEYS' FEES           |  |
|    |   | ATTORNETS FEES   |  |
| 14 | TICOR TITLE OF NEVADA, INC, et al.,   | [SECOND REQUEST]                                       |  |
| 15 | Defendants.   |  |  |
| 16 |   |  |  |
| 17 | Defendants Chicago Title Insurance Company ("Chicago Title") and Ticor Title of                   |  |  |
| 18 | Nevada, Inc. (collectively, "Defendants"), by and through their counsel of record, Early Sullivan |  |  |
| 19 | Wright Gizer & McRae LLP, and plaintiff Carrington Mortgage Services, LLC ("Carrington")          |  |  |
| 20 | (collectively with Defendants, the "Parties"), by and through its counsel of record, Akerman LLP, |  |  |
| 21 | hereby stipulate and agree as follows:  |  |  |
| 22 | 1. On Tuesday, May 12, 2020, Carrington filed its Motion to Remand and Motion for                 |  |  |
| 23 | Attorneys' Fees and Costs (ECF Nos. 13 and 14);   |  |  |
| 24 | 2. The Court previously extended Chicago Title's deadline to respond to Carrington's              |  |  |
| 25 | Motion To Remand and Motion for Attorneys' Fees and Costs from May 26, 2020, the day after        |  |  |
| 26 | Memorial Day, until June 9, 2020 (ECF No. 17);  |  |  |
| 27 | 3. Chicago Title's counsel is requesting a two-week extension up to and including                 |  |  |
|    |   |  |  |



| 1  | June 23, 2020 to file its opposition to Carrington's motion to remand and motion for attorneys' |  |
|----|---|--|
| 2  | fees and costs to accommodate to afford Chicago Title's counsel additional time to review and   |  |
| 3  | respond to Carrington's memorandum of points and authorities;                                   |  |
| 4  | 4. Counsel for Carrington does not oppose the extension;  |  |
| 5  | 5. This is the second request for an extension made by counsel for Chicago Title                |  |
| 6  | which is made in good faith and not for the purposes of delay.                                  |  |
| 7  | IT IS SO STIPULATED that Chicago Title's opposition to Carrington's Motion to                   |  |
| 8  | Remand and Motion for Attorney's Fees   | and Costs will extended two weeks, through and           |
| 9  | including June 23, 2020.  |  |
| 10 | AKERMAN LLP   | EARLY SULLIVAN WRIGHT                                    |
| 11 | AKERWAN LLI   | GIZER & McRAE LLP  |
| 12 |   |  |
| 13 | By: /s/Natalie L. Winslow<br>Ariel E Stern  | By: /s/Kevin S. Sinclair<br>Kevin S. Sinclair            |
| 14 | State Bar No. 8276  | State Bar No. 12277                                      |
| 15 | Natalie L. Winslow<br>State Bar No. 12125   | Sophia S. Lau<br>State Bar No. 13365                     |
| 16 | Nicholas E. Belay<br>State Bar No. 15175  | 8716 Spanish Ridge Ave., Ste. 105<br>Las Vegas, NV 89148 |
| 17 | 1635 Village Center Circle, Suite 200   |  |
| 18 | Las Vegas, NV 89134   | Attorneys for Defendants CHICAGO TITLE INSURANCE COMPANY |
| 19 | Attorneys for Plaintiff CARRINGTON MORTGAGE   | and TICOR TITLE OF NEVADA, INC.                          |
| 20 | SERVICES, LLC   |  |
| 21 | IT IS SO ORDERED.   |  |
| 22 | Dated June 1, 2020.   |  |
| 23 |   | Very C Mala  |
| 24 |   | UNITED STATES DISTRICT JUDGE                             |
| 25 |   | SIN ED SIMILO DIGITATO TODOL                             |
| 26 |   |  |
| 27 |   |  |

